



San Joaquin Valley

AIR POLLUTION CONTROL DISTRICT

AUG 21 2012

Timothy Alburger
Seneca Resources
2131 mars Court
Bakersfield, CA 93308

**Re: Administrative Amendment to Title V Operating Permit
District Facility # S-1114
Project # 1095502**

Dear Mr. Alburger:

In accordance with District Rule 2520, Federally Mandated Operating Permits, the District reviewed the Seneca Resources application and has administratively amended the requirements for their Title V operating permit. This administrative amendment incorporates the requirements of ATC S-1114-113-0, which was issued with Certificate of Conformity after EPA review into the Title V permit for this facility. The change is to install a new 85.0 MMBtu/hr steam generator. This amended Title V permit is being sent to you as a final action.

Your cooperation in this matter was appreciated. Should you have any questions, please contact Mr. Leonard Scandura at (661) 392-5500.

Sincerely,

A handwritten signature in black ink, appearing to read "David Warner".

David Warner
Director of Permit Services

DW:dbt

cc: Gerardo Rios, EPA Region IX

Enclosures

Seyed Sadredin
Executive Director/Air Pollution Control Officer

Northern Region
4800 Enterprise Way
Modesto, CA 95356-8718
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Central Region (Main Office)
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Southern Region
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San Joaquin Valley
AIR POLLUTION CONTROL DISTRICT



August 21, 2012

Seneca Resources Corporation
2131 Mars Court
Bakersfield, CA 93308-6830

Permit Number(s): S-1114-113-0

Rule 2010 5.0 – POSTING OF PERMIT TO OPERATE

A person who has been granted under Rule 2010, a permit to operate any equipment described in 2010, shall firmly affix such permit to operate, an approved facsimile, or other approved identification bearing the permit number upon the article, machine, equipment or other contrivance, in such a manner as to be clearly visible and accessible.

In the event that the equipment is so constructed or operated that the permit to operate cannot be so placed, the permit to operate shall be mounted so as to be clearly visible in an accessible place within 25 feet of the equipment or maintained readily available at all times on the operating premises.

SEYED SADREDIN
EXECUTIVE-DIRECTOR/APCO

San Joaquin Valley Air Pollution Control District

PERMIT UNIT: S-1114-113-0

EXPIRATION DATE: 02/29/2016

EQUIPMENT DESCRIPTION:

85 MMBTU/HR PCL NATURAL GAS AND WASTE GAS-FIRED STEAM GENERATOR, WITH NORTH AMERICAN LEL ULTRA LOW NOX BURNER AND FLUE GAS RECIRCULATION AUTHORIZED TO OPERATE AT VARIOUS SPECIFIED LOCATIONS

PERMIT UNIT REQUIREMENTS

1. This unit shall be equipped with horizontal convection section with at least 235 square feet of bare tube surface area (or thermodynamically equivalent number of square feet of finned tube) per MMBtu/hr of heat input. [Public Resources Code 21000-21177: California Environmental Quality Act]
2. This unit shall be equipped with variable frequency drive high efficiency electrical motors driving the blower and water pump. [Public Resources Code 21000-21177: California Environmental Quality Act]
3. Steam generator shall be equipped with operational fuel gas and waste gas volumetric flow meters . [District Rule 2201] Federally Enforceable Through Title V Permit
4. Only natural gas , or a combination of natural gas and waste gas shall be used as fuel in this steam generator. [District Rule 2201] Federally Enforceable Through Title V Permit
5. No air contaminant shall be discharged into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is as dark as, or darker than, Ringelmann 1 or 20% opacity. [District Rule 4101] Federally Enforceable Through Title V Permit
6. Particulate matter emissions shall not exceed 0.1 grains/dscf in concentration. [District Rule 4201] Federally Enforceable Through Title V Permit
7. The sulfur content of any fuel, or fuels combined, shall not exceed 1 grains of total sulfur (as H₂S) per 100 dscf of fuel gas. [District Rules 2201 and 4320] Federally Enforceable Through Title V Permit
8. If the unit is fired on noncertified gaseous fuel and compliance with SO_x emission limits is achieved through fuel sulfur content limitations, then the sulfur content of the gaseous fuel being fired in the unit shall be determined using ASTM D 1072, D 3031, D 3246, D 4084, D 4468, D 6667 or grab sample analysis by GC-FPD/TCD or double GC performed in the laboratory. [District Rule 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
9. When complying with sulfur emission limits by fuel analysis or by a combination of source testing and fuel analysis, each fuel source shall be tested weekly for sulfur content and higher heating value. If compliance with the fuel sulfur content limit and sulfur emission limits has been demonstrated for 8 consecutive weeks for a fuel source, then the fuel testing frequency shall be semi-annually. If a semi-annual fuel content source test fails to show compliance, weekly testing shall resume. [District Rules 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
10. If fuel analysis is used to demonstrate compliance with conditions of this permit, the fuel higher heating value for each fuel shall be certified by a third party fuel supplier or determined by ASTM D 1826 or D 1945 in conjunction with ASTM D 3588 for gaseous fuels. [District Rules 1070, 2201, 2520, and 4320] Federally Enforceable Through Title V Permit
11. Emissions shall not exceed any of the following limits: 7 ppmvd NO_x @ 3% O₂ or 0.0085 lb-NO_x/MMBtu, 0.00285 lb-SO_x/MMBtu, 0.0076 lb-PM₁₀/MMBtu, 42 ppmvd CO @ 3% O₂ or 0.031 lb-CO/MMBtu, or 0.00537 lb-VOC/MMBtu. [District Rules 2201, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE

These terms and conditions are part of the Facility-wide Permit to Operate.

12. This steam generator is approved for operation at the following locations: NE/4 Section 18, NE/4 Section 19 and NW/4 Section 20, Township 11 North, Range 23 West; NE/4 Section 15, Township 31 South, Range 22 East; and NE/4 Section 24, Township 26 South, Range 20 East, MDB&M. [District Rule 4201] Federally Enforceable Through Title V Permit
13. Permittee shall notify the District Compliance Division of each location at which the unit is located in excess of 24 hours. Such notification shall be made no later than 48 hours after starting operation at the location. [District Rule 1070] Federally Enforceable Through Title V Permit
14. Flue gas recirculation system shall be operated whenever generator is operated. [District Rule 2201] Federally Enforceable Through Title V Permit
15. The permittee shall monitor and record the stack concentration of NO_x, CO, and O₂ at least once every month (in which a source test is not performed) using a portable emission monitor that meets District specifications. Monitoring shall not be required if the unit is not in operation, i.e. the unit need not be started solely to perform monitoring. Monitoring shall be performed within 5 days of restarting the unit unless monitoring has been performed within the last month. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
16. If either the NO_x or CO concentrations corrected to 3% O₂, as measured by the portable analyzer, exceed the allowable emissions concentration, the permittee shall return the emissions to within the acceptable range as soon as possible, but no longer than 1 hour of operation after detection. If the portable analyzer readings continue to exceed the allowable emissions concentration after 1 hour of operation after detection, the permittee shall notify the District within the following 1 hour and conduct a certified source test within 60 days of the first exceedance. In lieu of conducting a source test, the permittee may stipulate a violation has occurred, subject to enforcement action. The permittee must then correct the violation, show compliance has been re-established, and resume monitoring procedures. If the deviations are the result of a qualifying breakdown condition pursuant to Rule 1100, the permittee may fully comply with Rule 1100 in lieu of the performing the notification and testing required by this condition. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
17. All alternate monitoring parameter emission readings shall be taken with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. The analyzer shall be calibrated, maintained, and operated in accordance with the manufacturer's specifications and recommendations or a protocol approved by the APCO. Emission readings taken shall be averaged over a 15 consecutive-minute period by either taking a cumulative 15 consecutive-minute sample reading or by taking at least five (5) readings, evenly spaced out over the 15 consecutive-minute period. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
18. The permittee shall maintain records of: (1) the date and time of NO_x, CO, and O₂ measurements, (2) the O₂ concentration in percent and the measured NO_x and CO concentrations corrected to 3% O₂, (3) make and model of exhaust gas analyzer, (4) exhaust gas analyzer calibration records, and (5) a description of any corrective action taken to maintain the emissions within the acceptable range. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
19. All emissions measurements shall be made with the unit operating either at conditions representative of normal operations or conditions specified in the Permit to Operate. No determination of compliance shall be established within two hours after a continuous period in which fuel flow to the unit is shut off for 30 minutes or longer, or within 30 minutes after a re-ignition as defined in Section 3.0 of District Rule 4306. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
20. The source test plan shall identify which basis (ppmv or lb/MMBtu) will be used to demonstrate compliance. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
21. Source testing to measure natural gas-combustion NO_x and CO emissions from this unit shall be conducted at least once every twelve (12) months. After demonstrating compliance on two (2) consecutive annual source tests, the unit shall be tested not less than once every thirty-six (36) months. If the result of the 36-month source test demonstrates that the unit does not meet the applicable emission limits, the source testing frequency shall revert to at least once every twelve (12) months. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

PERMIT UNIT REQUIREMENTS CONTINUE ON NEXT PAGE
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22. When the unit changes fuel source, the unit shall undergo source testing to measure NO_x and CO emissions within 60 days of the change unless the unit has already undergone source testing in the last twelve (12) months or thirty-six (36) months after demonstrating compliance on the previous two (2) source tests when fired on that fuel source. [District Rule 2201] Federally Enforceable Through Title V Permit
23. Compliance demonstration (source testing) shall be by District witnessed, or authorized, sample collection by ARB certified testing laboratory. [District Rule 1081] Federally Enforceable Through Title V Permit
24. Source testing shall be conducted using the methods and procedures approved by the District. The District must be notified 30 days prior to any compliance source test, and a source test plan must be submitted for approval 15 days prior to testing. [District Rule 1081] Federally Enforceable Through Title V Permit
25. The results of each source test shall be submitted to the District within 60 days thereafter. [District Rule 1081] Federally Enforceable Through Title V Permit
26. NO_x emissions for source test purposes shall be determined using EPA Method 7E or ARB Method 100 on a ppmv basis, or EPA Method 19 on a heat input basis. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
27. CO emissions for source test purposes shall be determined using EPA Method 10 or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
28. Stack gas oxygen (O₂) shall be determined using EPA Method 3 or 3A or ARB Method 100. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
29. Particulate matter emissions shall not exceed 0.1 grain/dscf at operating conditions, nor 0.1 grain/dscf calculated to 12% CO₂, nor 10 lb/hr. [District Rule 4201 and District Rule 4301, 5.1 and 5.2.3] Federally Enforceable Through Title V Permit
30. Emissions of sulfur compounds from this unit shall not exceed 200 lb per hour, calculated as SO₂. Compliance with this requirement may be demonstrated by testing the sulfur content of each fuel and determining the maximum hourly emissions of sulfur compounds by multiplying the sulfur content of each fuel in lb/MMBtu by the maximum heat input rating of the unit. [District Rule 2520, 9.3.2 and District Rule 4301, 5.2.1] Federally Enforceable Through Title V Permit
31. The concentration of sulfur compounds in the exhaust from this unit shall not exceed 0.2% by volume as measured on a dry basis over a 15 minute period. To demonstrate compliance with this requirement the operator shall test the sulfur content of each fuel source and demonstrate the sulfur content does not exceed 3.3% by weight for gaseous fuels. [District Rule 2520, 9.3.2, Kern County Rule 407] Federally Enforceable Through Title V Permit
32. For emissions source testing, the arithmetic average of three 30-consecutive-minute test runs shall apply. If two of three runs are above an applicable limit the test cannot be used to demonstrate compliance with an applicable limit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
33. Permittee shall maintain a record of the duration of each startup and shutdown of this unit. [District Rules 4305, 4306 and 4320] Federally Enforceable Through Title V Permit
34. Copies of all fuel invoices showing quantity and delivery points of gas delivered and copies of quality terms of gas delivery contracts shall be maintained. The operator shall record daily amount and type(s) of fuel(s) combusted and all dates on which unit is fired on any noncertified fuel and record specific type of noncertified fuel used. [District Rule 2520, 9.3.2] Federally Enforceable Through Title V Permit
35. Documentation showing that this unit is equipped with a horizontal convection section with at least 235 square feet of bare tube surface area (or thermodynamically equivalent number of square feet of finned tube) per MMBtu/hr of heat input and equipped with variable frequency drive high efficiency electrical motors driving the blower and water pump shall be retained on site. [Public Resources Code 21000-21177: California Environmental Quality Act]
36. All records shall be maintained and retained on-site for a minimum of five (5) years, and shall be made available for District inspection upon request. [District Rules 1070, 4305, 4306 and 4320] Federally Enforceable Through Title V Permit

These terms and conditions are part of the Facility-wide Permit to Operate.